

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE: **Harriet E. Salley**
Debtor.

Case No.: 20-33649-KRH
Chapter 13

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Jeanne E. Hovenden, counsel for Harriet E. Salley (“Debtor”) and hereby requests that the Court allow her to withdraw from this representation.

1. On August 29, 2020, the Debtor filed a voluntary petition Under Chapter 13 of the Bankruptcy Code.

2. Multiple plans have been filed in the case, but none have been confirmed due to a series of objections from the Chapter 13 trustee and creditors.

3. There have been things accomplished in the 2 years the case has been pending, including a loan modification on one mortgage and the sale of piece of real property that netted a secured creditor roughly two thirds of its claim.

4. Multiple motions for relief, motions to dismiss, and objections that have prevented plan confirmation have also been filed. Counsel is owed the \$3,484 balance of the “no-look” fee. The Debtor has orally agreed that Counsel has earned the remainder of the “no-look” fee. Counsel asks that the balance of that fee be ordered to be paid to Counsel by the chapter 13 trustee. The trustee is holding sufficient funds to pay the fee and has advised that she has no objection to the fee payment.

5. Counsel and Debtor can no longer communicate effectively in the case.

6. Counsel therefore wishes to resign and allow the Debtor to find other counsel, or to proceed *pro se*.

WHEREFORE, Jeanne E. Hovenden, seeks entry of an order allowing her to withdraw as Counsel for Harriet E. Salley and for the payment of \$3,484 in fees.

Respectively submitted:
Jeanne E. Hovenden, Esq.

/s/Jeanne E. Hovenden, Esq.
Jeanne E. Hovenden, VSB # 37249
Jeanne E. Hovenden, PLLC
P O Box 1839
Chesterfield VA 23832
804-706-1355

CERTIFICATE

I certify that a true copy of the foregoing Motion to withdraw as Counsel was sent by first class mail or electronic transmission to the parties below on October 28, 2022.

/s/ Jeanne E. Hovenden
Jeanne E. Hovenden, Esq.

Label Matrix for local noticing

0422-3

Case 20-33649-KRH

Eastern District of Virginia

Richmond

Mon Jan 10 12:54:33 EST 2022

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Fay Servicing, LLC
c/o McCalla Raymer Leibert Pierce, LLC
Bankruptcy Department
1544 Old Alabama Road
Roswell, GA 30076-2102

U.S. Bank Trust National Association, not in
BWW Law Group, LLC
8100 Three Chopt Road, Suite 240
Richmond, VA 23229-4833

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Amex
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

Amex/Bankruptcy
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

BCMB1 Trust
SN Servicing Corporation
323 5th Street
Eureka, CA 95501-0305

BWW Law Group
8100 Three Chopt Rd, Ste 240
Henrico, VA 23229-4833

Clearwater Pool Service
570 E. Hundred Road
Chester, VA 23836-2617

Comenity Bank/Wayfair
Attn: Bankruptcy Dept
Po Box 182125
Columbus, OH 43218-2125

Credit Union Of Rich
Po Box 26024
Richmond, VA 23260-6024

(p)CREDIT UNION OF RICHMOND
ATTN NANCY ALLISON
1601 OWNBY LANE
RICHMOND VA 23220-1318

Department Stores National Bank
c/o Quantum3 Group LLC
PO Box 657
Kirkland, WA 98083-0657

Fay Servicing Llc
Attn: Bankruptcy Dept
Po Box 809441
Chicago, IL 60680-9441

Harriet Salley Auto Sales LLC
4009 Mechanicsville Tpke
Richmond, VA 23223-1117

Macy's (p)
RE: Bankruptcy
P O Box 9001094
Louisville, KY 40290-1094

Navy Federal Credit Union
Attn: Bankruptcy
Po Box 3000
Merrifield, VA 22119-3000

Quantum3 Group LLC as agent for
MOMA Trust LLC
PO Box 788
Kirkland, WA 98083-0788

U.S. Bank Trust National Association et al.
Fay Servicing, LLC
PO Box 814609
Dallas, TX 75381-4609

USAA Federal Savings Bank
Attn: Bankruptcy
10750 McDermott Freeway
San Antonio, TX 78288-1600

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4905 Radford Ave
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Richmond, VA 23230-3525

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